

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
BMO HARRIS BANK N.A. f/k/a HARRIS)
BANK N.A. AS SUCCESSOR IN)
BUSINESS TO AMCORE BANK N.A.,)
f/k/a AMCORE TRUST COMPANY,)
SUCCESSOR TO DIXON NATIONAL)
BANK, AS TRUSTEE UNDER)
AGREEMENT DATED APRIL 19, 1977)
KNOWN AS TRUST NO. 1058, and not)
personally; UNKNOWN OWNERS; and)
NONRECORD CLAIMANTS;)
Defendants.)

Case No. 3:12-cv-50064

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

Attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1", Affidavit).

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: /s/ Kimberly J. Goodell
KIMBERLY J. GOODELL
Attorney for the United States
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CERTIFICATE OF SERVICE

I, Kimberly J. Goodell, certify that a true and correct copy of the foregoing **MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE** was served upon counsel of record through operation of the Court's Case Management/Electronic Case Files system on June 11, 2012, and on the following non-ECF filers:

Colleen Hennessy, Registered Agent
BMO HARRIS BANK N.A. f/k/a HARRIS
BANK N.A. AS SUCCESSOR IN
BUSINESS TO AMCORE BANK N.A.,
f/k/a AMCORE TRUST COMPANY,
SUCCESSOR TO DIXON NATIONAL
BANK, AS TRUSTEE UNDER
AGREEMENT DATED APRIL 19, 1977
KNOWN AS TRUST NO. 1058, and not personally;
111 West Monroe Street, 22nd Floor
Chicago, Illinois 60603

Louise F. Gotsch, Land Trust Administrator
BMO HARRIS BANK N.A. f/k/a HARRIS
BANK N.A. AS SUCCESSOR IN
BUSINESS TO AMCORE BANK N.A.,
f/k/a AMCORE TRUST COMPANY,
SUCCESSOR TO DIXON NATIONAL
BANK, AS TRUSTEE UNDER
AGREEMENT DATED APRIL 19, 1977
KNOWN AS TRUST NO. 1058, and not personally;
501 7th Street
Rockford, Illinois 61104-1242

Unknown Owners and NonRecord Claimants
601 Countryside Lane
Dixon, Illinois 61021

By: *Kimberly J. Goodell*
KIMBERLY J. GOODELL
Potestivo & Associates, P.C.
Attorneys for Plaintiff
223 W. Jackson Blvd., Suite 610
Chicago, Illinois 60606
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